



Ronai & Ronai, LLP

Attorneys at Law

The Ronai Building
34 Adee Street, Port Chester, New York 10573
Telephone (914) 824-4777

June 26, 2020

VIA ECF

Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Manhattan Office:
The Chrysler Building
405 Lexington Ave. 26th Fl.
New York, NY 10174
Telephone (212) 268-4777

Re: Mirtill Lewis and Elvira Lewis v. Lendlease (US) Construction Lmb Inc. et al.
Case No.: 1:18-cv-08662-LJL

Your Honor:

We represent plaintiffs Mirtill Lewis and Elvira Lewis in the above referenced matter. We respectfully submit this letter to jointly request an extension of the discovery deadlines and adjournment of the post-discovery status conference presently scheduled for July 30, 2020.

This request is being made due to the need to still hold party depositions and to conduct expert discovery. Depositions were contemplated to be completed in April 2020, however, the undersigned handling attorney contracted COVID-19 and was unable to work. Presently, I am feeling much better and have re-commenced working. The parties wish to conduct depositions in person and are in the process of scheduling same - based upon the re-opening of New York State under the direction of Governor Cuomo. Further, as the re-opening of New York State has now begun, expert discovery will be able to commence as practitioners have reopened.

As such, we respectfully request that the original discovery deadlines be extended or adjourned as follows:

- Depositions to be completed by September 30, 2020.
- Expert discovery to be completed by November 14, 2020.
- End date for all discovery extended from June 30, 2020, to November 14, 2020.
- Post-Discovery status conference adjourned from July 30, 2020, to November 30, 2020.

There have been no previous requests for extending said deadlines or adjournment of the post-discovery status conference with Your Honor. Defense counsel Joseph Rava has joined in and consented to same. At the time of the filing of this letter, I have not received any objections from the other Defendants to this request.

Thank you for your consideration of our joint request.

Having received no objections, the application for extensions is GRANTED.
The status conference previously set for July 30, 2020 is ADJOURNED to
November 30, 2020 at 3:00 p.m.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Timothy J. Lavin'.

Timothy J. Lavin (TL6371)

Cc: All parties via ECF

6/30/2020

A handwritten signature in black ink, appearing to read 'Lewis J. Liman'.

LEWIS J. LIMAN
United States District Judge